

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	Civil Action No.
v.	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
	*	
Defendants.	*	

**DEFENDANTS’ OBJECTIONS TO DEPOSITION QUESTIONS OF  
LATASHA KEBE**

<b>I. NOVEMBER 19, 2020—DEPOSITION OF LATASHA KEBE</b>		
		<b>OBJECTIONS</b>
<b>1</b>	009:24 – 020:07	Relevance
<b>2</b>	020:23 – 023:24	Relevance; Confidential
<b>3</b>	046:10 – 049:22	Relevance
<b>4</b>	049:23 – 051:03	Relevance; Unfairly Prejudicial
<b>5</b>	051:04 – 051:16	Relevance
<b>6</b>	051:17 – 056:03	Relevance; Impermissible Character Evidence
<b>7</b>	056:04 – 057:12	Relevance; Impermissible Character Evidence
<b>8</b>	057:13 – 060:09	Relevance; Impermissible Character Evidence

<b>9</b>	060:09 – 061:15	Relevance; Impermissible Character Evidence
<b>10</b>	086:25 – 089:20	Relevance
<b>11</b>	089:20 – 101:20	Relevance
<b>12</b>	101:21– 110:04	Relevance
<b>13</b>	118:03 – 118:07	Relevance
<b>14</b>	120:09 – 140:11	Relevance
<b>15</b>	148:06 – 159:21	Relevance
<b>16</b>	159:24 – 160:19	Relevance
<b>17</b>	160:20 – 163:14	Relevance
<b>18</b>	163:15 – 186:06	Relevance
<b>19</b>	191:03 – 191:12	Hearsay
<b>20</b>	194:05 – 195:14	Relevance
<b>21</b>	199:16 – 202:05	Relevance; Improper Character Evidence
<b>22</b>	229:24 – 233:03	Relevance
<b>23</b>	238:24 – 240:21	Relevance
<b>24</b>	241:12 – 242:13	Relevance
<b>25</b>	242:17– 244:18	Relevance
<b>26</b>	254:13 – 256:03	Relevance
<b>27</b>	265:24 – 266:03	Relevance
<b>28</b>	276:21 – 278:05	Relevance
<b>29</b>	286:10– 290:08	Relevance

<b>II. NOVEMBER 30, 2020—DEPOSITION OF LATASHA KEBE</b>		
		<b>OBJECTIONS</b>
<b>1</b>	020:08 – 033:04	Relevance
<b>2</b>	033:05 – 040:24	Relevance
<b>3</b>	040:14 – 041:11	Relevance
<b>4</b>	066:23 – 067:04	Mischaracterization of Testimony
<b>5</b>	096:07 – 099:09	Relevance
<b>6</b>	101:09 – 102:21	Confusion; Waste of Time; Relevance
<b>7</b>	119:17 – 120:07	Relevance
<b>8</b>	162:04 – 163:02	Relevance
<b>9</b>	167:16 – 168:15	Asking Defendant whether she’s seen medical records Plaintiff has marked confidential.
<b>10</b>	175:13 – 176:23	Relevance
<b>11</b>	176:24– 188:12	Relevance
<b>12</b>	188:13– 192:02	Relevance
<b>13</b>	192:03 – 195:24	Relevance
<b>14</b>	197:06 – 200:06	Relevance
<b>15</b>	200:07 – 202:16	Relevance
<b>16</b>	215:05 – 217:04	Relevance
<b>17</b>	220:09 – 223:10	Relevance
<b>18</b>	225:11 – 228:11	Relevance
<b>19</b>	233:24 – 243:25	Relevance

<b>20</b>	244:05– 245:05	Relevance
<b>21</b>	245:06 – 245:16	Relevance
<b>22</b>	245:17 – 249:02	Relevance
<b>23</b>	249:10 – 250:01	Relevance
<b>24</b>	259:10 – 297:93	Relevance

Submitted this 8<sup>th</sup> day of January, 2022.

*/s/Sadeer Sabbak*  
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LATASHA TRANSRINA KEBE, et all	*	
	*	
	*	
Defendants.	*	

**CERTIFICATE OF SERVICE OF DEFENDANT KEBE**

I hereby certify that I electronically served upon Lisa Moore at lisa@themoorefirm.com, Andrew Pequignot at andrew@themoorefirm.com, Gary P. Adelman at g@adelmanmatz.com, and Sarah M. Matz at sarah@adelmanmatz.com the following: **Defendants' Objections to Deposition Questions of Latasha Kebe.**

Respectfully submitted this 9<sup>th</sup> day of January, 2022.

*/s/Sadeer Sabbak*  
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